

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SCOTT MCMAHON,	)	
on behalf of plaintiff and the class members	)	
described below,	)	
	)	Case No. 14-cv-5257
Plaintiff,	)	The Honorable Judge Grady
	)	
vs.	)	
	)	
GALAXY ASSET PURCHASING, LLC	)	
and CONVERGENT OUTSOURCING, INC.	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION TO ENTER AND CONTINUE  
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

Plaintiff Scott McMahon respectfully requests that his motion for class certification be entered and continued until the Court sets an initial status hearing in this matter.

In support of this motion, plaintiff states as follows:

1. Plaintiff filed his complaint and motion for class certification, on July 10, 2014 because of the decision in *Damasco v. Clearwire Corp.*, 662 F.3d 891 (7th Cir. 2011).
2. Plaintiff noticed the motion for class certification for July 16, 2014.
3. Defendants Galaxy Asset Purchasing, LLC and Convergent Outsourcing, Inc. have not yet been served with either the complaint or the motion for class certification, and accordingly, have not yet appeared.
4. Therefore, plaintiff requests that his motion for class certification be entered and continued until the Court sets an initial status hearing in this matter.

WHEREFORE, plaintiff respectfully requests that his motion for class certification be entered and continued until the Court sets an initial status hearing in this matter.

Respectfully submitted,

s/ Tara L. Goodwin  
Tara L. Goodwin

Daniel A. Edelman  
Tara L. Goodwin  
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC  
120 S. LaSalle Street, 18th floor  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)

**CERTIFICATE OF SERVICE**

I, Tara L. Goodwin, hereby certify that on July 10, 2014 a true and accurate copy of the foregoing document was filed via the Court's CM/ECF system. The foregoing document will be served by hand delivery upon the following party, along with the summons and complaint in this matter:

**Convergent Outsourcing, Inc.**  
c/o CT Corporation System, Registered Agent  
208 S. LaSalle St., Suite 814  
Chicago, IL 60604

I further certify that the foregoing document will be sent to a process server to be served by hand delivery upon the following party, along with the summons and complaint in this matter:

**Galaxy Asset Purchasing, LLC**  
Illinois Corporation Service  
801 Adlai Stevenson Drive  
Springfield, Illinois 62703

s/ Tara L. Goodwin  
Tara L. Goodwin

Daniel A. Edelman  
Tara L. Goodwin  
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC  
120 S. LaSalle Street, 18th floor  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)